

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: ETHICON WAVE 12 CASES LISTED IN PLAINTIFFS' EXHIBIT A	

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF
ELIZABETH KAVALER, M.D. FOR WAVE 12**

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert response filed in relation to Elizabeth Kavalier, M.D. in Ethicon Wave 1, Case No. 2:12-md-02327, ECF. No. 2165 (memorandum in support of opposition). Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing, and as stated in the Court's Memorandum Opinion and Order (*Daubert* Motion re: Elizabeth Kavalier, M.D.) [Dkt. 2704]. This notice applies to the Wave 12 cases identified in Plaintiffs' Exhibit A.

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

COUNSEL FOR DEFENDANTS
ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
William M. Gage